



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DKK/ICR/FJN
F. #2021R00059

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 1, 2021

By ECF

Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Brendan Hunt
Criminal Docket No. 21-86 (PKC)

Dear Judge Chen:

The government writes in response to the defendant's June 1, 2021 motion seeking to reschedule the deadline for the defendant's reply to the government's response in opposition to the defendant's Rule 29 motion for a judgment of acquittal (currently due on June 2, 2021), the oral argument on that motion (currently scheduled for June 4, 2021 at 11:00 a.m.), and various deadlines in relation to the defendant's sentencing (currently scheduled for June 22, 2021). These dates were set at the defendant's request.

Notably, although the government communicated to the defendant that the government has no objection to rescheduling the sentencing proceeding to a date at which all participants can be present in August or September,¹ the defendant's letter does not reflect the government's objection to the defendant's request to reschedule the argument on the defendant's Rule 29 motion to the week of July 12, 2021. As the government advised the defendant before the defendant filed the rescheduling motion, the government believes there is no reason to delay any argument on the fully briefed Rule 29 motion until July, and that the motion should be decided at the earliest opportunity. As for the deadline for the defendant's reply brief, the government submits that the defendant has had ample time to prepare responses to the government's opposition brief and should file it, if at all, on June 2, 2021. Nor is there any reason for the parties to begin preparing sentencing submissions before resolution of the

¹ As the government indicated to defense counsel, the government is available for sentencing during the weeks of August 16th and August 23rd, or any date in September after September 6th.

defendant's Rule 29 motion, which motion does not implicate the unrelated question of the sentence to be imposed.

The government further objects to converting the scheduled in-person June 4, 2021 oral argument on the defendant's Rule 29 motion to a remote proceeding. Notably, at the defendant's request all of the pretrial litigation and the trial itself were conducted in person, and the parties have been planning to appear in person on June 4, 2021, since the Court scheduled the oral argument on the defendant's Rule 29 motion for that date.

Very truly yours,

MARK J. LESKO
Acting United States Attorney

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cc: Clerk of the Court (PKC) (by ECF)
Defense counsel (by ECF)